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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FOREMOST INSURANCE COMPANY,  
GRAND RAPIDS, MICHIGAN,  
Plaintiff,

vs.

MATTHEW DINOFIA; RHODA TO  
RECOVERY, LLC d/b/a JOURNEY TO  
RECOVERY; MICHELLI KALTSAS;  
CHARLESTON RESIDENTIAL SERVICES,  
LLC d/b/a CROSSROADS OF SOUTHERN  
NEVADA; CARLENA BROWN, as Statutory  
Heir and as Co-Administrator to the ESTATE of  
GEORGE MITCHELL, JR.; GEORGE  
MITCHELL, as Statutory Heir and as Co-  
Administrator to the ESTATE of GEORGE  
MITCHELL, JR., and DOES 1 -10,  
Defendants.

Case No.: 2:25-cv-00334-CDS-MDS

**STIPULATION FOR EXTENSION OF**  
**TIME TO FILE RESPONSE BRIEF**

The Parties, by and through their respective counsel, stipulate and agree as follows pursuant to NRAP 31(b)(2):

1. Plaintiff's reply brief is currently due December 26, 2025 as a consequence of Defendant Dinofia having previously been granted a stipulated extension of time;

2. Due to the upcoming Christmas Holiday, the parties have agreed to extend Foremost Insurance Company's response to Mr. Dinofia's Consolidated Opposition to Motion for Summary Judgement and Countermotion for Summary Judgment (ECF 44) to December 31, 2025.

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3. This is Plaintiff's first request for an extension in this matter.

**STIPULATED AND AGREED BY:**

Dated this 22<sup>nd</sup> day of December, 2025.

Dated this 22<sup>nd</sup> day of December, 2025.

**THALGOTT LAW, PLLC**

**LAXALT LAW GROUP, LTD.**

/s/ Evan P. Thalgott

Evan P. Thalgott, Esq. (SBN 15658)  
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*Attorney for Defendant and  
Counterclaimant Matthew Dinofia*

/s/ Christian L. Moore

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Foremost Insurance Company,  
Grand Rapids, Michigan*

Based on the parties' stipulation, Foremost Insurance Company's response to Mathew Dinofia's Consolidated Opposition to Motion for Summary Judgement and Countermotion for Summary Judgment is extended to December 31, 2025.

UNITED STATES MAGISTRATE JUDGE

DATED: 12-30-25